

GIBBONS P.C.

One Gateway Center

Newark, New Jersey 07102-5310

Tel: (973) 596-4500

Fax: (973) 596-0545

Attorneys for Respondent, Steven Lee

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES,

Plaintiff,

v.

STEVEN LEE,

Respondent.

Civil Action No. 23-mj-9089 (CLW)

Document electronically filed

**CERTIFICATION OF ANNE M.
COLLART IN SUPPORT OF
RESPONDENT'S OPPOSITION TO
EXTRADITION**

I, **ANNE M. COLLART, ESQ.**, of full age, hereby certify as follows:

1. I am an attorney at law of the States of New Jersey and New York and a Director at the law firm of Gibbons, P.C., counsel for Respondent Steven Lee ("Respondent") in the above-captioned matter.

2. I submit this Certification in Further Support of Respondent's Opposition to the Government's Request for the Extradition of Steven Lee.

3. Attached hereto as **Exhibit 1** is a true and correct copy of a declaration of Rebecca Smith, General Counsel for Lone Star Global Acquisitions, LLC.

4. Attached hereto as **Exhibit 2** is a true and correct copy of the expert opinion and report of Ambassador Martin Uden.

5. Attached hereto as **Exhibit 3** is a true and correct copy of the expert opinion and report by Professor Sang-Hyun Lee.

6. Attached hereto as **Exhibit 4** is a true and correct copy of the expert opinion and report by George Tugushi.

7. Attached hereto as **Exhibit 5** is a true and correct copy of the August 7, 2012 deed for purchase of 1414 Whippoorwill Way, Mountainside, NJ..

8. Attached hereto as **Exhibit 6** is a true and correct copy of the February 23, 2000 deed for the purchase of 12013 Edgestone Road, Dallas, Texas.

9. Attached hereto as **Exhibit 7** is a true and correct copy of the June 5, 2002 deed for the sale of 12013 Edgestone Road, Dallas, Texas.

10. Attached hereto as **Exhibit 8** is a true and correct copy of an email dated February 4, 2003, between Steven Lee's wife, Kathy Lee, and Tom De Mattia, with the subject line of "RE: homeowners insurance."

11. Attached hereto as **Exhibit 9** is a true and correct copy of the January 22, 2003 deed for the purchase of 15 East Lane, Short Hills, NJ.

12. Attached hereto as **Exhibit 10** is a true and correct copy of the April 19, 2004 deed for the sale for 15 East Lane, Short Hills, NJ.

13. Attached hereto as **Exhibit 11** is a true and correct copy of an email dated September 2, 2003, from hoffarch@aol.com to Steven Lee and Kathy Lee, with the subject line of "Drawings and a personal meeting."

14. Attached hereto as **Exhibit 12** is a true and correct copy of an email dated June 15, 2003, from Steven Lee to hoffarch@aol.com, copying his wife, Kathy Lee, with the subject line of "schedule."

15. Attached hereto as **Exhibit 13** is a true and correct copy of the July 29, 2004 deed for the purchase of 18 Madison Terrace, Short Hills, NJ.

16. Attached hereto as **Exhibit 14** is a true and correct copy of Mr. Lee's driver's license, issued on September 1, 2004, and showing his address of 18 Madison Terrace, Short Hills, NJ.

17. Attached hereto as **Exhibit 15** is a true and correct copy of an email exchange dated August 4, 2004, between Steven Lee and Mary McNamara, copying Kathy Lee, with the subject line of "Re: Doctors, etc. in NJ."

18. Attached hereto as **Exhibit 16** is a true and correct copy of the 2004-2005 First Grade Progress Report for Jonathan Lee from Millburn Public Schools.

19. Attached hereto as **Exhibit 17** is a true and correct copy of the 2004-2005 certificate from Andrew Lee's attendance at Kent Place School Nursery Program.

20. Attached hereto as **Exhibit 18** is a true and correct copy of Mr. Lee's student identification card from Columbia University from the Spring 2006 semester.

21. Attached hereto as **Exhibit 19** is a true and correct copy of the International Centre for Settlement of Investment Disputes ("ICSID") Award Letter in the matter *LSF-KEB Holdings SCA and others v. Republic of Korea*, ICSID Case No. ARB/12/37, Award (Aug. 30, 2022). An electronic copy of the decision is also available at <https://italaw.com/cases/2022>.

22. Attached hereto as **Exhibit 20** is a true and correct copy of an email exchange occurring between July 14, 2006 and July 17, 2006, between Steven Lee's attorneys, Lawrence Lustberg and Robert Hanna, and a prosecutor from the Korean Supreme Prosecutors' Office, Yung Sang Lee.

23. Attached hereto as **Exhibit 21** is a true and correct copy of an email exchange occurring between July 14, 2006 and July 19, 2006, between Steven Lee's attorneys, Lawrence

Lustberg and Robert Hanna, and a prosecutor from the Korean Supreme Prosecutors' Office, Yung Sang Lee.

24. Attached hereto as **Exhibit 22** is a true and correct copy of the July 28, 2006 fax communication between Steven Lee's attorney, Lawrence Lustberg, and a prosecutor from the Korean Supreme Prosecutors' Office, Yung Sang Lee.

25. Attached hereto as **Exhibit 23** is a true and correct copy of an email exchange occurring between August 9, 2006 and August 18, 2006, between Steven Lee's attorney, Lawrence Lustberg, and a prosecutors from the Korean Supreme Prosecutors' Office, Gwang Su Oh and Sangjoon Cho, with the subject line of "Re: Steven Lee".

26. Attached hereto as **Exhibit 24** is a true and correct copy of the Korean Business Registration Certificate, with an English translation provided by Professor Sang-Hyun Lee included.

27. Attached hereto as **Exhibit 25** is a true and correct copy of the March 7, 2023 letter from Rebecca Smith, General Counsel for Lone Star Global Acquisitions, LLC.

28. Attached hereto as **Exhibit 26** is a true and correct copy of an October 13, 2023 letter from Mid-Atlantic Surgical Associates regarding Mr. Lee's recent heart attack and surgery.

29. Attached hereto as **Exhibit 27** is a true and correct copy of an English translation of the August 18, 2017 Order from the Italian Court of Appeal of Milano, issuing the release of Steven Lee. The original Order in Italian is also included following the English translation.

30. Attached hereto as **Exhibit 28** is a true and correct copy of the March 4, 2023 character reference letter from Senior Pastor, Reverend Sung Hwan No and Former Senior Pastor, Reverend Bong Kee Huh.

31. Attached hereto as **Exhibit 29** is a true and correct copy of the March 5, 2023 character reference letter from Pilgrim Mission Church, by Dr. Reverend Paul Yang.

32. Attached hereto as **Exhibit 30** is a true and correct copy of an email exchange occurring between July 3, 2006 and July 4, 2006, between Steven Lee's attorney, Lawrence Lustberg, and Sarah S. Cho, with the subject line of "RE: Korea news summary."

33. Attached hereto as **Exhibit 31** is a true and correct copy of a September 22, 2017 news article by The Korea Bizwire, with the title, *Former Head of Lone Star Apprehended in Italy*. An electronic copy of the article can be found at <http://koreabizwire.com/former-head-of-lone-star-korea-apprehended-in-italy/92284>.

34. Attached hereto as **Exhibit 32** is a true and correct copy of a July 4, 2006 news article by International Herald Tribune, with the title, *South Korea blames its growing pains on 'vulture' funds*. An electronic copy of the article can be found at <https://www.nytimes.com/2006/07/04/business/worldbusiness/04iht-star.2116696.html>.

35. Attached hereto as **Exhibit 33** is a true and correct copy of a November 28, 2005 news article by Newsweek International, with the title, *South Korea: A Buyout Backlash: 'speculative' funds are under fire for big profits*.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

Dated: October 16, 2023
Newark, New Jersey

s/ Anne M. Collart

Anne M. Collart, Esq.

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